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April 20,2007

By Electronic Filing

J EDWIN TURI INGTON

JOHN M. CROSS, JR

Ex Parte Presentation

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. – TW-A325 Washington, D.C. 20554

PHILLIPJ. LONG ANDREW T. TRIPP

Re: Docket No. 96-128, Inmate Remand and Wright Petition

Dear Ms. Dortch:

On April 18, 2007, Vincent Townsend, President of Pay Tel Communications, Inc., and Marcus W. Trathen of Brooks, Pierce, McLendon, Humphrey & Leonard, LLP, met with Albert Lewis, Pamela Arluk, Doug Galbi, and Lynne Hewitt Engledow of the Wireline Competition Bureau.

In this meeting, we discussed positions of record in the proceeding regarding inmate calling services as well as the information summarized in the attached materials.

Sincerely yours,

Marcus W. Trathen

cc: Albert Lewis Pamela Arluk

Doug Galbi

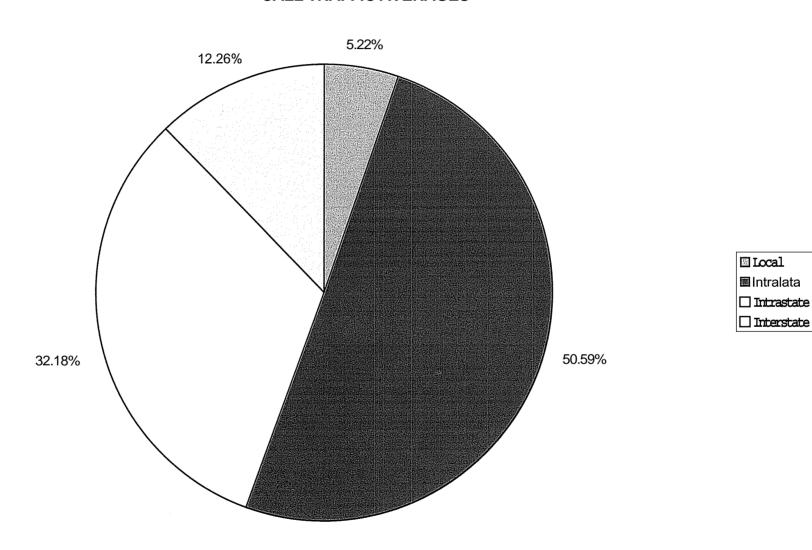
Lynne Hewitt Engledow

|--|

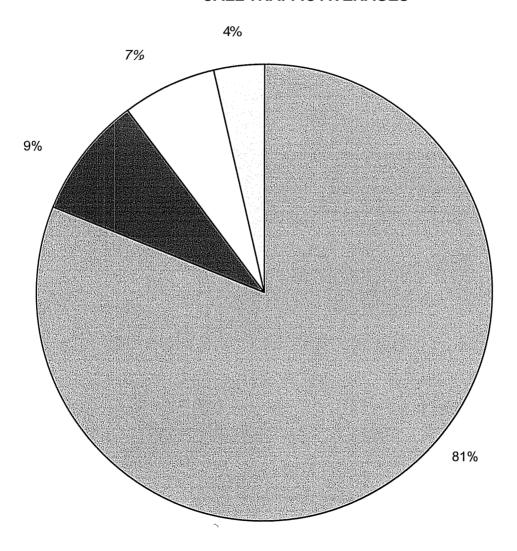
04-4-	Rate	200			\!:_!:_!! !			llect		III I n ma n t -	n			otal	Rate	Rote Con Detaile
State	Source	BOC	********			ocal Call Rate	Ca		1	l'I Inmate			K	ate	Cap?	Rate Cap Details
	SBC	SBC	LMC (if app)	Init. Min. NIA	Add'l Min. N/A	Notes - Call Rate	Su \$	rcharge 3.45		rcharge 1.70		harge 0.50	\$	6.15	Yes	Commission rate cap
exas			\$0.50			Providermarket based coin rate		4.99	φ.	1.70	_		_	6.04	No Yes	Commission rate cap
	Qwest	Qwest	\$0.50	NIA NIA		Providertariffed coin rate	\$		-			0.55		4.80	No	
ebraska '	Qwest	Qwest	\$0.50 \$0.50	NIA	NIA	Provider tariffed coin rate Provider tariffed coin rate	\$ \$	3.75 3.75	-			0.55		4.80	No	
/yoming	Qwest	Qwest							1-		Ф	0.55		4.45	Yes	Capped at twice AT&T or BOC rate
Visconsin	SBC	SBC	\$0.50	N/A		<u>Providermarketbasedcoinrate</u>	\$	3.95	-					4.45		
1ichigan	SBC	SBC	\$0.50	N/A	N/A	Providermarket based coin rate	\$	3.95	+				\$	4.45	No	Benchmarkswere repealed 111106
	SBC-SWB						٦		1				_			Local inmate Surcharge is in lue of LMC + \$1.70 additional Inm
ansas	Public	SBC	N/A	N/A	NIA		\$	2.35	\$	1.70				4.05	<u>No</u>	Surcharge.
linois	SBC	SBC	N/A		3 0.1275		\$_	2.71						4.00	No	Inmate is not subjuct to Commission jurisdiction (Dkt 05-0429)
<u>lassachusetts</u>			N/A	\$ 0.10			\$	3.00	_					4.00	Yes	Usage capped at LEC, surcharge is Commission imposed
klahoma	SBC	SBC	\$0.50	N/A	NIA		\$'	1,65	\$	1.70				3.85	Yes	Capped max. rate of LEC or IXC
onnecticut	SBC	SBC	\$0.50	NIA	N/A	Providermarket based coin rate	\$	3.00						3.80	No	
alifornia	SBC	SBC	\$0.50	NIA	N/A	Provider market based coin rate	\$	1.50	\$	1.70	\$	0.30	\$	3.70	No	
									1							Not Inmate Specific. Commission has providers register as OS
hode island	Verizon	Verizon	NIA	\$ 0.19	\$ 0.19	BOC Rate	\$	1.75	1				\$	3.65	No	Waivers. Has also allowed higher surcharges than the cap.
ndiana		SBC	\$0.50	N/A		Providermarket based coin rate	\$	3.00	t					3.50	Yes	Capped at LEC
rkansas	SBC	SBC	NIA	N/A		Providermarket based coin rate	\$	1.80	\$	1.70			\$	3.50	No	Service charge is in lue of LMC.
ı nai isas	ODC	JDDO	1 41/7	19/5			\top	1.00	+*	1.75			Ψ	2.20	. 10	Rates are presumed reasonable if no higherthan IXC which is
/lissouri	SBC	SBC	\$0.50	N/A	N/A	Provider market based coin rate	l _s	0.81	\$	1.70	\$	0.25	\$	3.26	No	an AOS (e.g., AT&T, MCI. Sprint)
			\$0.50	NIA			\$	2.10	1-2	1./0		0.25		3.15	No	an Aco (e.g., Atat, Wol. Spillit)
	Qwest	Qwest				Provider tariffed coin rate			1			0.55				
lew Mexico	Qwest	Qwest	\$0.50	N/A		Provider market based coin rate	\$	1.98	-		\$	0.55		3.03	No	
laska	Evercom	Verizon	N/A	\$ 0.34	\$ 0.13		\$	1.50	-				\$	3.01	N/A	Evercomonly inmate phone provider in Alaska
	BellSouth/	BellSouth	\$0.50	N/A	N/A	Provider tariffed coin rate	l s	2.50					\$	3.00	Yes	Capped at BOC rate
Aississippi	Cap			N/A		Provider tariffed coin rate	\$		+		_	-		3.00	No	Not Regulated; HB 337
Kentucky		BellSouth	\$0.50				_		-		_	0.55				Ů,
Colorado	Qwest	Qwest	\$0.50	N/A		Provider tariffed coin rate	\$	1.85				0.55		2.90	No	Deregulated as of June 6th, 2003.
Montana	Qwest	Qwest	\$0.50	NIA	N/A	Provfder market based coin rate	\$	2.00	_		\$	0.26		2.76	Yes	Capped at commission benchmarks
New York	Verizon	Verizon	NIA	\$ 0.10	\$ -		\$	1.75						2.75	No	
Jtah	Qwest	Qwest	\$0.50	N/A	N/A	Providertariffed coin rate	\$	2.25					\$	2.75	No	
																No cap on usage. Surcharge: \$2.15 per-callcollect - Staff
Nest Virginia	Verizon	Verizon	\$0.50	N/A	N/A	Provider market based coin rate	\$	2.00			\$	0.25	\$	2.75	Yes	Imposed
Maine	Verizon	Verizon	NIA	\$ 0.18	\$ 0.14		\$	1.30					\$	2.74	No	
Geomia	Сар	BellSouth	\$0.50	NIA	NIA	Provider market based coin rate	\$	2.20					\$	2.70	Yes	Commission inmate rate caps
South Carolina		BellSouth	\$0.10.	N/A		Provider tariffed Inmate rate	\$	2.50						2.60	Yes	Only the surcharge is capped
Oregon	Qwest	Qwest	\$0.73	N/A		Provider tariffed Inmate rate	\$		1		\$	0.55		2.58	No	only the saterial general composition
Minnesota	Qwest	Qwest	\$0.70	NIA	NIA	1	\$	1.30	_			0.55		2.55	No	
			\$0.74	NIA	NIA		\$	1.26	_			0.55	\$	2.55	Yes	Capped at BOC rate. No cap for Local Calls.
<u>owa</u>	Qwest	Qwest				Danida and dath and data at	— -		+		φ	0.55		2.25	Yes	\$0.36/min + \$2.75 surcharge • 04-1785-TP-ORD; 12/29/05
<u>Ohio</u>	SBC	SBC	\$0.50	NIA	NIA	Provider market based coin rate	\$	1.75	+				φ	2.23	162	\$0.30/\text{fill} + \$2.73 \text{ suicharge* 04-1763-11-OKD, } 12/29/03
Florida	BellSouth/ CAP	BellSouth	\$0.50	N/A	N/A	Providermarket based coin rate	1 \$	1.75					\$	2.25	Yes	Commission rate cap - BellSouthrates match cap
Delaware	Verizon	Verizon	\$0.50	NIA		Provider market based coin rate	\$		1					2.25	No	Donosali nato nap
	Verizon		\$0.50	N/A		Provider market based coin rate Provider market based coin rate	\$		+					2.23	Yes	Capped at LEC tariff rate
/ermont		Verizon		NIA		r rovider marketbasedcom rate			+		Ф	0.25		2.13	Yes	Capped at LEC tariii rate Capped max. rate of LEC or IXC
Pennsylvania	Verizon	Verizon	\$0.07	INIA	- NIA	Drovidoutouiffodo-i	\$		+		Φ	0.23		1.95		
rizona	Qwest	Qwest	\$0.50	N//A		Providertariffed coin rate	\$				<u></u>	0.26	\$		Yes	Capped at LEC tariff rate
daho	Qwest	Qwest	\$0.35	N/A	N/A	Providertariffed coin rate	\$	1.30	+			0.26		1.91	No	
levada	SBC/Cap	SBC	NIA	\$ 0.14	\$ 0.05	Providermarket basedcoin rate	- \$		1		\$	0.24		1.83	Yes	Commission rate cap
Nabama	BellSouth	BellSouth	\$0.50	NIA	N/A		\$	1.25	<u> </u>				\$	1.75	Yes	
	Hawaiian	Hawaiian							1							No specific rates caps are stated. However, they must match t
ławaii	Telcom	Telcom	\$0.50	NIA	N/A	Provider tariffed coin rate	\$						\$	1.70	No	providers tariffed rates. (§6-82-60)
Vashington	Qwest	Qwesi	N/A	N/A	N/A		\$	1.39			\$	0.26	\$	1.65	No	New 50150 Rules regarding Rate Quoting. No Caps
forth Carolina	Bell South	BellSouth	\$0.2427	N/A	NIA		\$	1.40	L^{-}				\$	1.65	Yes	Capped at LEC tariff rate
New Hampshire			\$0.50	N/A	NIA	Providermarketbased <i>coin</i> rate	\$						\$	1.55	Yes	Capped at Verizon's rates for similar services
New Jersev	Verizon	Verizon	NIA	\$ 0.09	\$ 0.05		\$		_				\$	1.53	No	
ennessee	Commission		\$0.50	N/A	N/A	Provider market based coin rate	\$	1.20					\$	1.50	Yes	Commission local inmate cap: \$1.50/call
Maryland	Verizon	Verizon	\$0.50	N/A	N/A	Providermarket based coin rate	\$				\$	0.25	\$	1.35	No	No Caps
ouisiana	Cap	BellSouth	\$0.35	See Note		commission cap: \$.35 per 5 min.	\$				-	0.20	\$	1.33	Yes	Commission rate cap
	Verizon	Verizon	\$0.35	N/A	NIA	Provider market based coin rate	\$		+		_		\$	1.25	No	Not regulated
/irginia				19/74	I INIA I	E LOWINEL MALKEL NASEN COIN TATE			1				•0	1 / 2 1	INO	INOLIEGUIALEG

Source: Technologies Management, Inc.

PRISONS CALL TRAFFIC AVERAGES

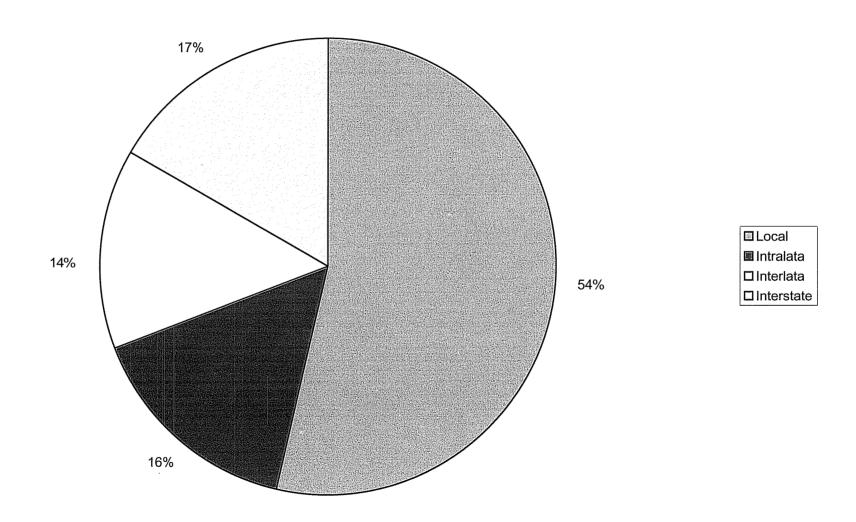


COUNTY JAILS CALL TRAFFIC AVERAGES

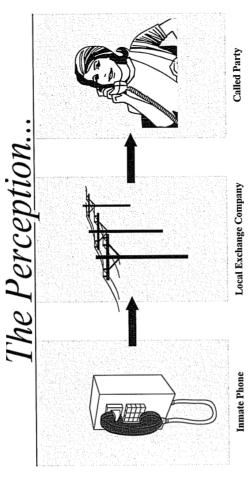




COUNTY JAILS CALL REVENUE AVERAGES



INMATE TELEPHONE SERVICE



The Reality...

equipment with vandal proof limate volce Penmpts -Phone laken off hook Planse sed Zeror futs the number Your call will be placed as a collect call. State your name now (beep) Yourname has been recorded as (Iryaw want to record your name apain did that? One mammal while your number is being validated and accepts call answers phone and call have one more minute for your call have one more minute for your call have fifteen seconds left You have fifteen seconds left You have fifteen seconds left.	Inmate Phone
- One of switches for individual inmale phones	PHONE CONTROLS OCIO Bind: 1 Bind: 2 OCIO COI Bind: 2 OCI Bind: 3 Bind: 4 Inmate Phone Manual Controls
Basic Functions Adminated Processor ("ACP") ACP Automated Processor ("ACP") Automated Processor ("ACP") Automated Processor ("ACP") Automated Processor ("ACP") ACP Determines conrect cell routing Call breakings unibable calls to a company humber ("ACP") ACP Determines conrect cell routing Call breakings ("ACP") ACP Determines conrect cell routing Call breakings ("ACP") ACP Determines conrect cell routing Call breakings ("ACP") ACP Determines correct cell routing ACP Determines correct cell routing ACP Determines correct cell routing Call breakings ("ACP") ACP Determines correct cell routing Call breakings ("ACP") ACP Determines correct cell routing Fraud digit election to prevent secondary dial lone Fraud digit election to prevent secondary dial lone secondary dial lone Fraud digit election to prevent secondary dial lone archiving of conversations Automatic collinate conversations Record and playback of immate conversations Automatic collinate conversations Automatic col	ITS Automated Call Processor (ACP)
Basic System Operation Once or more facility officers per shift Trained on operation of the ITS Autswer questions from immates and hamily members. How calls are billed Hay calls are bicked How calls are billed Hay calls are bicked How calls are billed Hay calls are bicked How calls are billed How calls	Facility Administration
Precord & Monitor Calls Thro or more hacility officers per shift Flag alls for system alents for real impressipations forms and impressipations forms and impressipations for a convensations Recording and playback of immate convensations in the convensations for the convensations of the convensations and exception that the convensations of t	Facility Recording and Monitoring System Officer Responsibilities
·LEC connects long distance calls ·IVC connects long distance calls	Local Exchange Company
Called Party Volce Prompts Called party answers phone You have a called call from frame of immal) at figure of drailly idential called three If you will accept did "three" To drailine the call, did "thin" or hang up now. Called party dials "three" to accept call through of the call did failed Communications of altead. Au end of call You have one more minute for your call have filteen seconds left You have filteen seconds left	Called Party
Monitor automatic pollimpibodoing cycles 24/17 (ed.) and provided automatic pollimpibodoing cycles 24/17 (ed.) and provided collection on individual cycles 24/17 (ed.) and provided collection on individual cycles (collection) and provided collection on individual cycles (collection) and cycles	ITS Operations Center 24/7 Client Support
Customer Service Shaft will: Provide 2/d account setup Bilingual CSRs Calling Jan Inquiries Calling Jan Jan Calling Jan Calling Jan Calling Jan Calling Jan Calling Jan Customer return findings Customer return findings	ITS Customer Service 24/7 Support
LEC Billing Processiny billing records to LECs Identify off-ret and Code 50 rejects Maintin Indabases for off-net and Code 50 rejects Direct Bill & Prepaid Accounts Provide 2 VII account setup Whelaids access for customers to setup and manage fine account Automated from account estup Cepter (Venicolaries) Fraud Control Fraud Control Fraud Control Fraud Process account about Process account abo	Billing Systems